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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

**JENI PEARSONS AND MICHAEL
STORC,**

Plaintiffs,

v.

**UNITED STATES OF AMERICA;
Federal Bureau of Investigation
Special Agent LYNNE ZELLHART,
in her individual capacity; and DOES
1 through 5, Federal Bureau of
Investigation agents in their
individual capacities,**

Defendants.

Case No. 2:23-cv-07952

**PLAINTIFFS' NOTICE OF
RELATED CASES**

Plaintiffs Jeni Pearsons and Michael Storc hereby provide notice of related cases pursuant to Local Rule 83-1.3.1. This case is related to the following cases that have been filed in this Court (which are also noted on the civil cover sheet):

Case Title	Case No.	Date Filed
<i>U.S. v. U.S. Private Vaults</i>	No. 21-cr-106	3/9/2021
<i>John Doe v. U.S., et al.</i>	No. 21-cv-2803	3/31/2021
<i>James Poe v. U.S., et al.</i>	No. 21-cv-2900	4/3/2021
<i>Richard Roe v. U.S., et al.</i>	No. 21-cv-2919	4/5/2021
<i>Michael Moe v. U.S., et al.</i>	No. 21-cv-2990	4/6/2021
<i>Charles Coe v. U.S., et al.</i>	No. 21-cv-3019	4/7/2021
<i>Does 1-6 v. U.S., et al.</i>	No. 21-cv-3254	4/15/2021
<i>Michael Magee v. U.S., et al.</i>	No. 21-cv-3294	4/16/2021
<i>Mitchell Magee v. U.S., et al.</i>	No. 21-cv-3298	4/16/2021
<i>Louis Loe v. U.S., et al.</i>	No. 21-cv-3348	4/19/2021
<i>Dr. Linda R., et al. v. U.S.</i>	No. 21-cv-3554	4/26/2021
<i>John Joe v. U.S., et al.</i>	No. 21-cv-4366	5/25/2021
<i>Paul Snitko, et al. v. U.S.</i> ¹	No. 21-cv-4405	5/27/2021
<i>Peter Gallagher v. U.S.</i>	No. 21-cv-5073	6/22/2021
<i>Jack Doe, et al. v. U.S., et al.</i>	No. 21-cv-5695	7/14/2021
<i>Donald Leo Mellein, et al. v. U.S., et al.</i>	No. 21-cv-6588	8/13/2021
<i>United States v. \$305,000</i>	No. 21-cv-6968	8/30/2021

¹ Plaintiffs here are also plaintiffs in case no. 21-cv-4405, which is currently pending before the United States Court of Appeals for the Ninth Circuit.

Case Title	Case No.	Date Filed
<i>United States v. \$341,500.00</i>	No. 21-cv-6967	8/30/2021
<i>United States v. \$399,000.00</i>	No. 21-cv-6966	8/30/2021
<i>United States v. \$600,980.00</i>	No. 21-cv-6965	8/30/2021
<i>United States v. \$599,870.00 Plus Coins, et al.</i>	No. 21-cv-7078	9/2/2021
<i>United States v. \$462,880.00 Plus Jewelry</i>	No. 21-cv-7077	9/2/2021
<i>United States v. \$400,000.00</i>	No. 21-cv-7153	9/7/2021
<i>United States v. \$240,000.00 and Misc. Precious Items</i>	No. 21-cv-7155	9/7/2021
<i>United States v. \$1,500,090.00</i>	No. 21-cv-7192	9/8/2021
<i>United States v. \$709,900.00</i>	No. 21-cv-7191	9/8/2021
<i>United States v. \$250,000.00</i>	No. 21-cv-7188	9/8/2021
<i>United States v. \$914,700.00</i>	No. 21-cv-7242	9/9/2021
<i>United States v. \$150,900.00</i>	No. 21-cv-7231	9/9/2021
<i>United States v. \$1,083,740.00</i>	No. 21-cv-7279	9/10/2021
<i>United States v. \$1,182,500.00</i>	No. 21-cv-7286	9/10/2021
<i>United States v. \$1,207,685.00</i>	No. 21-cv-7276	9/10/2021
<i>United States v. \$443,000.00</i>	No. 21-cv-7315	9/13/2021
<i>United States v. \$1,479,100.00</i>	No. 21-cv-7311	9/13/2021
<i>United States v. \$256,276.00, et al.</i>	No. 21-cv-7310	9/13/2021
<i>United States v. \$325,680.00</i>	No. 21-cv-7331	9/14/2021
<i>United States v. \$274,030.00</i>	No. 21-cv-7481	9/17/2021
<i>United States v. \$330,020</i>	No. 21-cv-7472	9/17/2021

Case Title	Case No.	Date Filed
<i>United States v. \$199,950.00</i>	No. 21-cv-7487	9/17/2021
<i>United States v. \$154,600.00</i>	No. 21-cv-7484	9/17/2021
<i>United States v. \$1,194,750.00</i>	No. 21-cv-7477	9/17/2021
<i>United States v. \$570,000.00</i>	No. 21-cv-7463	9/17/2021
<i>United States v. \$340,000.00, et al.</i>	No. 21-cv-7505	9/20/2021
<i>United States v. \$200,000.00</i>	No. 21-cv-7566	9/22/2021
<i>United States v. \$217,285.00 and Two Rolex Watches, et al.</i>	No. 22-cv-0015	1/3/2022
<i>United States v. Cryptocurrency</i>	No. 22-cv-0556	1/26/2022
<i>Doe I, et al. v. United States, et al.</i>	No. 22-cv-1722	3/15/2022
<i>United States v. \$726,300.00, and 196 Misc. Collectible Coins</i>	No. 22-cv-5908	8/19/2022

Both this lawsuit and the above lawsuits originated with the government's March 22, 2021, raid of U.S. Private Vaults (USPV), a private safe-deposit box company that operated in Beverly Hills, California. The above lawsuits include the criminal proceeding against USPV (which included motions for the return of property filed by non-parties), separate lawsuits by boxholders challenging the seizure of their property and seeking its return, a class action (*Snitko*) challenging whether the Fourth Amendment permitted the government to open and search the safe-deposit boxes, and civil forfeiture actions brought by the government against property it seized from some of the safe-deposit boxes. This case centers on obtaining a remedy for two individual Plaintiffs, who stored personal property in their safe-deposit box at USPV that was lost after the government took custody of it during the raid. It therefore involves different legal theories and different forms of

1 relief, and generally challenges different aspects of the government's USPV raid,
2 than the cases identified above. This case and the cases identified above will
3 nevertheless involve some factual overlap regarding the execution of the raid and
4 the conduct of ensuing searches.

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6
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8 Dated: September 22, 2023

Respectfully Submitted,

9 /s/ Lou Egerton-Wiley

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